

CAPCOA Spring Meeting Monitoring Updates

CARB TSA Corrective Action Plan

Background: On January 31st, 2013 CARB submitted the Corrective Action Plan (CAP) to address the findings from our 2011 Technical System Audit (TSA). The TSA evaluated ambient air monitoring in the entire CARB Primary Quality Assurance Organization (PQAO) and included on-site reviews of CARB operations plus three local districts: San Joaquin Valley APCD (SJVAPCD), Mendocino County AQMD (MCAQMD), and Imperial County APCD (ICAPCD). CARB has assumed a leadership role in coordinating the corrective action process for all the participant agencies.

Key Messages for CAPCOA:

- Of the 95 findings from EPA's 2011 TSA, we recently approved the proposed corrective action for 60 of the findings, with the remaining 35 findings still in progress.
- As part of corrective action, CARB is in the process of developing letters of agreement with agencies in its PQAO, establishing ambient air monitoring roles and responsibilities (meeting EPA's regulations and quality system goals). The first model of this successful approach is between CARB and Great Basin. EPA strongly encourages this approach.
- CARB is also developing a state-wide training program. Interested Districts should continue to work with CARB in the development of this training, and should seek out training opportunities as it becomes established.
- EPA is working with CARB on approval of their Quality Management documents. Next steps will be for Districts to either formally adopt CARB quality document, or get formal approval of their own.
- The monthly CAPCOA Monitoring Steering Committee calls have been very helpful in sharing information and coordinating between all monitoring agencies in California.

EPA's Review of the CAP: EPA sent a response letter to CARB with a cc. to SJVAPCD, MCAQMD, and ICAPCD on April 19th, 2013. EPA approved the majority of the corrective actions. Some findings could not be approved at that time due to issues such as lack of detail, additional internal review needed by EPA, or additional coordination needed between CARB and the local district. The status of the proposed corrective actions at the time of the letter were:

- Total: there were 95 findings that needed to be addressed in the CAP
 - 60 approved, 35 in progress
- CARB: there were 67 CARB findings
 - 57 were approved, 10 in progress
- San Joaquin Valley APCD: there were 11 findings
 - None were approved, all in progress
- Mendocino County AQMD: there were 10 findings
 - 1 was approved, 9 in progress
- Imperial County APCD: there were 11 findings
 - 6 were approved, 5 in progress

Current Status: EPA continues to work with CARB and the local districts on the in-progress corrective actions. EPA is having regular conference calls with all the local districts and a monthly conference call with all the TSA participant agencies. CARB has requested that we work to approve

the remaining in-progress corrective actions over the next few months, and no later than the end of the year.

Local District Issues:

- San Joaquin Valley APCD: We have held one call with CARB and SJVAPCD to discuss our review of the CAP and one subsequent call with CARB. CARB and EPA have come to an agreement of what is needed to make 8 of the 11 CAPs approvable. One of the remaining finding CAPs (for correcting data submission issues) needs to be revised by SJVAPCD since they have indicated a desire to remove all references to a new data acquisition/management system from their CAP. We have not yet discussed two of the remaining finding CAPs (unacceptable data loss and network modifications with the agencies at this time.
- Mendocino County AQMD: MCAQMD's APCO recently left the agency, leaving the monitoring staff as the Acting APCO. Since there has not been a replacement for the monitoring staff, MCAQMD's ability to address EPA's concerns has been waylaid. CARB and EPA are strategizing how to move this forward in spite of the staffing challenges.
- Imperial County APCD: We had a call with CARB and ICAPCD to discuss our review of the "in progress" Corrective Actions. EPA, CARB, and ICAPCD have come to agreement on how to resolve these remaining issues.

California Air Monitoring Network Assessment Tool (CAMNAT)

Background: EPA provided \$200,000 to develop an air monitoring network database to be used as a repository and network plan tool for air monitoring agencies in California. The project is being managed by BAAQMD. The database will contain the information that is currently required for Annual Network Plans and will provide various tools for data compilation and network assessment.

Key Messages for CAPCOA:

- Each agency will have control over information for their sites. There will not be a report or evaluation of the network as part of this project.
- This project provides consistent storage of network information and tools for agencies to evaluate their own networks. Use of the tool should help Districts and CARB meet regulatory requirements for future annual network plans, and perform their required 5-year network assessment.
- Once the database content and structure are finalized, agencies will have the option of populating the database themselves or having the contractor populate the database using previous network plans and AQS data.

Current Status: EPA, CARB, and BAAQMD are working with the contractor (Providence) to identify a draft set of database fields. The contractor is also assembling a workgroup comprised of local districts that will provide feedback on the database structure and content once it is ready for review.

Next Steps:

- The database review is expected to occur over the summer.
- The contractor will develop network evaluation tools over the fall.
- The project is expected to be completed during the winter 2014 in order for use in that year's annual network plan preparation.

EPA's Interim Exceptional Events Guidance

Background:

- EPA first released draft exceptional events implementation guidance documents to state, local, and tribal agencies, and to other parties as requested, in May of 2011. EPA incorporated some of the commenters' feedback into the revised draft guidance documents, which were made available for broad public review in a July 6, 2012.
- EPA's interim exceptional events guidance was signed on May 10, 2013 and included (1) Guidance Memo (2) Interim Exceptional Events Rule Frequently Asked Questions document and (3) Interim Guidance on the Preparation of Demonstrations in Support of Requests to Exclude Ambient Air Quality Data Affected by High Winds Under the Exceptional Events Rule. See attached Fact Sheet.

Key Messages for CAPCOA:

- The intent of the guidance is to help ensure an efficient and effective process to make exceptional events determinations, streamline processes and reduce costs for air agencies preparing requests, and the EPA offices reviewing these submittals.
- EPA will also pursue Exceptional Events Rule (EER) revisions. We anticipate proposing these rule revisions in late 2013 or early 2014 and finalizing a revised rule in late 2014 or early 2015.
- EPA is actively seeking to resolve outstanding issues related to wildfire events and ozone. We do not yet have a timeline for when an updated Fire Policy or Wildfire Exceptional Events Guidance will be issued.